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 FEDERAL COMMUNICATIONS COMMISSION and
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MINORITY TELEVISION PROJECT, INC.,
 Plaintiff,
 v.
 FEDERAL COMMUNICATIONS
 COMMISSION and UNITED STATES OF
 AMERICA,
 Defendants.

Case No. C 06-02699 EDL
 STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO EXTEND TIME
 FOR DEFENDANTS TO RESPOND TO
 COMPLAINT

STIPULATED REQUEST

On September 19, 2006, plaintiff Minority Television Project, Inc. filed its complaint in this action, alleging nine causes of action arising from a forfeiture order by the FCC. Pursuant to

Stip. & ~~Prop.~~ Order Extending Time to Resp. to Compl.
 Case No. C 06-02699 EDL

1 this Court's orders dated August 31 and September 18, 2006, defendants' response to the
 2 complaint is currently due on October 18, 2006. Defendants have prepared a motion to dismiss
 3 several of the causes of action based on lack of jurisdiction, and such motion is ready for filing.
 4 They are in the process of preparing a motion to dismiss the remainder of the complaint based on
 5 failure to state a claim, but that motion will not be completed by October 18, 2006 because of the
 6 nature of the issues involved. Accordingly, to preclude the need to have two separate motions
 7 and two separate hearings, the parties jointly request that the Court extend defendants' time to
 8 respond to the complaint thirty days, to November 17, 2006. Such timeline is consistent with
 9 Federal Rule of Civil Procedure 12(a)(3), which allows federal defendants 60 days to respond to
 10 a complaint.

11 DATED: October __, 2006

Respectfully submitted,
 KEVIN V. RYAN
 United States Attorney

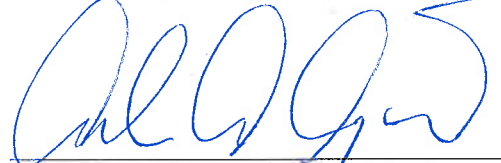
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 13 Letitia R. Kim

Digitally signed by Letitia R. Kim
 DN: CN = Letitia R. Kim, C = US, O
 = Department of Justice, OU = U.S.
 Attorney's Office
 Date: 2006.10.04 12:14:54 -07'00'

14 LETITIA R. KIM
 15 Assistant United States Attorney
 Attorneys for Defendants

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 17 DATED: October 4, 2006

PINNACLE LAW GROUP LLP

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21 ANDREW A. AUGUST
 Attorneys for Plaintiff

~~[PROPOSED]~~ ORDER

Pursuant to the parties' stipulated request, the Court hereby extends the defendants' time to respond to plaintiff's complaint to November 17, 2006.

IT IS SO ORDERED.

Dated: October 4, 2006

